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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

JORGE TORRES BORRERO, AN
INDIVIDUAL,

PLAINTIFF,

VS.

AMAZON. COM SERVICES LLC, A
DELAWARE CORPORATION; AND
DOES 1-50, INCLUSIVE,

DEFENDANTS.

Case No.: 2:23-CV-02753-DJC-CSK
Complaint: October 10, 2023
Removal: November 27, 2023

**AMENDED JOINT STIPULATION
TO AMEND THE COURT'S
SCHEDULING ORDER**

Plaintiff JORGE TORRES BORRERO (“Plaintiff”) and Defendant AMAZON. COM SERVICES LLC (“Defendant”) (collectively, the “Parties”) by and through their respective attorneys of record, and pursuant to Federal Rule of Civil Procedure Rule 16(b)(4), hereby STIPULATE to, and respectfully request, a continuance of the deadlines set forth in the Court’s Amended Schedule Order (See Dkt. 10) (the “Existing Schedule”). The Parties believe such good cause and factual circumstances exist as follows:

1. Under the Existing Schedule, the close of fact discovery is set for October 17, 2024; the deadline to *hear* a dispositive motion is May 15, 2025; and the trial is set for September 29, 2025.

2. Discovery is well underway. Both parties served an initial set of written discovery requests. Pursuant to the Parties’ meet and confer efforts, Defendant served documents and is preparing supplemental responses to Plaintiff’s first set of written discovery. Plaintiff also served a second set of written discovery with responses due in August. Additionally, the Parties are in the process of scheduling multiple depositions within the next forty-five (45) days.

3. The Parties intend to explore the potential for early resolution through private mediation and have agreed to retain Patricia Gillette to conduct the mediation. Given Defendant’s counsel’s trial schedule, tentative deposition dates, as well as the mediator’s schedule, the earliest mutually available date for mediation with Ms. Gillette is December 3, 2024.

4. The parties desire to avoid the incurrence of additional discovery costs while they attempt to negotiate a resolution of this matter in good faith.

5. For the aforementioned reasons, the Parties respectfully request that the Court grant a continuance of the pretrial dates as follows:

Event	Current Date	Proposed Date
Fact Discovery Cut-Off	October 17, 2024	January 6, 2025
Expert Disclosure & Reports	November 18, 2024	February 6, 2025
Rebuttal Experts Disclosure	December 18, 2024	March 6, 2025
Expert Discovery Cut-Off	January 17, 2025	March 26, 2025

Last Day to File Dispositive Motion	March 28, 2025	June 13, 2025
Dispositive Motion Hearing Date	May 15, 2025, at 1:30 PM	August 7, 2025, at 1:30 PM
Last Day to File Joint Pretrial Statement	July 24, 2025	October 16, 2025
Final pretrial conference	July 31, 2025, at 1:30 PM	October 23, 2025, at 1:30 PM
Trial	September 29, 2025, at 9:00 AM	December 8, 2025, at 8:30 AM

6. Notably, neither Party previously requested any modification to the Court's scheduling order. The Parties request these continuances to further the interests of justice, and not for purposes of delay, harassment, or any other improper purpose.

WHEREFORE, the Parties respectfully request this Court modify the scheduling order.

Dated: August 6, 2024

BROCK & GONZALES

/s/ D. Aaron Brock

D. Aaron Brock

Brigid O'Reilly

Attorney for Plaintiff,

JORGE TORRES BORRERO

Dated: August 6, 2024

SEYFARTH SHAW LLP

/s/ Angelina T. Evans

Kerry M. Friedrichs

Angelina T. Evans

Attorneys for Defendant,

AMAZON.COM SERVICES LLC

ORDER

GOOD CAUSE APPEARING, the Court hereby approves this Stipulation to Amend the Court's Scheduling Order

Dated: August 6, 2024

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE